COUNTY OF PLACER DEPARTMENT OF HEALTH AND HUMAN SERVICES ENVIRONMENTAL HEALTH DIVISION

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July 12, 2007

JoAnn Jaschke Cal EPA Unified Program 1001 I Street, P.O. Box 2815 Sacramento, CA 95812-2815

Subject:

Placer County Environmental Health Services CUPA – Fourth Corrective

Action Status Report for the July 19 and 20, 2006 CUPA Evaluation

Dear Ms. Jaschke:

The following information is provided to update our progress in correcting program deficiencies identified during the July 19 and 20, 2006 CUPA evaluation:

#9

The Enforcement and Inspection Plan was reviewed and updated on July 11, 2007.

#12

As previously indicated, current HMBP inventories are verified by staff during on-site annual inspections. Documentation is kept in each file and forwarded to fire agencies accordingly. As indicated previously, facilities which do not come into compliance within 30 days are re-visited by staff. Effective July 2007, the current status of inventories and certifications shall be noted in the Envision database. Implementation of an electronic database will enable Placer County Environmental Health Services to track the status of inventories/certifications more readily and to identify those facilities that update by mail. Inspection records indicate 46 % of the HMBP facilities have current inventories or certifications for FY 2006/2007. Placer County Environmental Health Services continues to address the reduction in three program staff members, and has only recently been able to add a new permanent program supervisor. Overall, with the implementation of electronic data management, Placer County Environmental Health Services will better be able to identify the updates on file and manage the program.

<u>#13</u>

The part-time "extra help" dedicated to CalARP has completed further field training and recently attended a training session at Sacramento County Environmental Management Department on July 11, 2007. Staff has evaluated stationary sources and identified an inventory of ten facilities. One of these ten stationary sources has been inspected recently. With the recent addition of part-time "extra-help," subsequent training and a new permanent program supervisor, Placer County Environmental Health Services intends to complete two-thirds of the facility inspections by September 30, 2007.

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#15

Placer County Environmental Health Services recently obtained a list of four hundred contacts from the local Agricultural Commissioner. These contacts may be potential agricultural handlers that are subject to HMBP requirements. Staff is in the process of evaluating the list and is preparing an outreach survey to identify locations at which hazardous materials are handled. The survey is due for mail out by July 31, 2007. Thereafter, upon receipt and processing of survey information, subject facilities shall be incorporated into the HMBP program accordingly.

Observation #12

Battalion Chief Keith Burson, from South Placer County Fire District, indicated to this office that he will research the "fee and permit process" matter and provide the requested information. Another request for an update on the status of his efforts was made on July 11, 2007 by this office. We are awaiting a response.

If you have any questions regarding this correspondence, please contact me at (530) 745-2300.

Sincerely,

Valerie Kauffman

Supervising REHS

Hazardous Materials and Solid Waste Section

Placer County Environmental Health Services

Cal/EPA's Response to Placer County's Deficiency Status Report (Update 4)

CUPA: Placer County Environmental Health Services

Date of Evaluation: July 19 and 20, 2006

Date of Update 4: July 13, 2007

Cal/EPA's response

1. Previously Corrected – via update 2.

- 2. Previously Corrected July 2006.
- 3. Previously Considered corrected via update 2.
- 4, 5, and 6. Previously Corrected via update 2.
- 7. Previously Corrected via update 1.
- 8. Previously Corrected via update 1.
- 9. Corrected Placer County reviewed their EIP on July 11, 2007. Therefore, this deficiency has been corrected.
- 10. Previously Corrected via update 3.
- 11. Previously Corrected via update 1.
- 12. The CUPA is making progress toward correcting this deficiency. The move to electronic recordkeeping will help. Please report progress on the next quarterly report.
- 13. Please report progress on next quarterly report. If the CUPA's plan to inspect 2/3 of the stationary sources by the end of September 2007 is successful, OES will consider the deficiency corrected.
- 14. Previously Corrected via update 1.
- 15. Corrected The corrective action required for this deficiency was to form a plan to pull ag handlers into the business plan program, as appropriate, and to begin to execute the plan. The CUPA's response in update 4 satisfies this corrective action. The deficiency is corrected.

In addition to the identified deficiencies, Placer County is following up with Observation 12 from the evaluation.

Observation #12

Cal/EPA Response: Cal/EPA considers this in progress of being addressed. Let Cal/EPA know whether or not South Placer Fire District is using sections 8001.3.2 and 8001.3.3 of the Uniform Fire Code as authority for their permitting and fee schedule in the next deficiency progress report.